

1 SMILAND CHESTER ALDEN LLP
2 Theodore A. Chester, Jr. (SBN 105405)
3 Mary C. Alden (SBN 100023)
4 140 South Lake Avenue, Suite 274
5 Pasadena, California 91101
6 Telephone: (213) 891-1010

7 Attorneys for Little Rock Sand and Gravel, Inc.;
8 The George and Charlene Lane Family Trust;
9 The Frank and Yvonne Lane 1993 Family Trust;
10 Monte Vista Building Sites, Inc., and A.V. Materials, Inc.

11
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF LOS ANGELES
14

15 Coordination Proceeding Special Title
16 (Rule 1550 (b))

Judicial Council Coordination No. 4408
[Assigned to Hon. Jack Komar; Dept 17]

17 **ANTELOPE VALLEY GROUNDWATER**
18 **CASES**

Santa Clara Case No.: 1-05-CV-049053

19 Included **CONSOLIDATED** Actions:

STIPULATION AND [PROPOSED]
ORDER TO SET ASIDE DEFAULT OF
CROSS-DEFENDANT FRANK A. LANE;
AND FOR ORDER CORRECTING
AMENDED EXHIBIT 1 TO [PROPOSED]
JUDGMENT AND PHYSICAL
SOLUTION

20 Los Angeles County Waterworks District No.
21 40 vs. Diamond Farming Company
22 Los Angeles Superior Court Case No.
23 BC325201

24 Los Angeles County Waterworks District No.
25 40 vs. Diamond Farming Company
26 Kern County Superior Court Case No. S-1500-
27 CV-254348 NFT

28 Diamond Farming Company vs. City of
Lancaster Riverside County Superior Court
Lead Case No. RIC 344436 [Consolidated w/
Case Nos. 344668 & 353840]

Willis v. Los Angeles County Waterworks
District No. 40; Los Angeles Superior Court
Case No. BC 364553

Wood v. Los Angeles County Waterworks
District No. 40; Los Angeles Superior Court
Case No. BC 391869

1 WHEREAS, Cross-Complainants Los Angeles County Waterworks District No. 40,
2 Palmdale Water District, Littlerock Creek Irrigation District, Palm
3 Ranch Irrigation District, Quartz Hill Water District, California Water Service Company,
4 Rosamond Community Services District, City of Palmdale and City of
5 Lancaster (collectively, the "Public Water Suppliers") filed on January 14, 2008 their
6 Amendment to First Amended Cross-Complaint naming Frank A. Lane as cross-defendant Roe
7 612;

8 WHEREAS, Frank A. Lane died January 23, 2008;

9 WHEREAS, on December 13, 2011 the Frank and Yvonne Lane 1993 Family Trust (the
10 "Family Trust") as "successor in interest to Frank A. Lane, Roe 612" filed its Answer in these
11 proceedings;

12 WHEREAS, thereafter the Public Water Suppliers filed a Request for Default, and on
13 March 23, 2012, default was entered against "Frank A. Lane, Roe 612" (the "Default");

14 WHEREAS, because Frank A. Lane is deceased and because an Answer was filed by his
15 successor, the parties hereto believe that the Default was inadvertently requested and entered and
16 should be set aside.

17 NOW THEREFORE, it is hereby stipulated by and between the Public Water Suppliers,
18 by and through their counsel of record, and the Family Trust by and through its counsel of
19 record, Smiland Chester Alden LLP, that the Court issue (1) an Order to set aside the Default
20 entered on March 23, 2012 as against Frank A. Lane; and (2) an Order correcting Amended
21 Exhibit 1 to [Proposed] Judgment and Physical Solution, filed December 4, 2015.

22 Dated: December 16, 2015

BEST BEST & KRIEGER LLP

23
24 By 

25 ERIC I. GARNER
26 JEFFREY V. DUNN
27 WENDY Y. WANG
28 Attorneys for
LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40

1 Dated: December 15, 2015

LAGERLOF SENEAL GOSNEY &
KRUSE

Thomas S. Bunn III
Thomas Bunn III
Attorney for Palmdale Water District

6 Dated: December ____, 2015

LEMIEUX & O'NEILL

W. Keith Lemieux
Attorney for Littlerock Creek Irrigation
District and Palm Ranch Irrigation District

11 Dated: December ____, 2015

CHARLTON WEEKS LLP

Bradley T. Weeks
Attorney for Quartz Hill Water District

16 Dated: December ____, 2015

CALIFORNIA WATER SERVICE
COMPANY

John Tootle
Attorney for California Water Service
Company

22 Dated: December ____, 2015

MURPHY & EVERTZ LLP

Douglas J. Evertz
Attorney for City of Lancaster and
Rosamond
Community Services District


1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: December ____, 2015

LAGERLOF SENEAL GOSNEY &
KRUSE

Thomas Bunn III
Attorney for Palmdale Water District

Dated: December 24, 2015

LEMIEUX & O'NEILL


Keith Lemieux
Attorney for Littlerock Creek Irrigation
District and Palm Ranch Irrigation District

Dated: December ____, 2015

CHARLTON WEEKS LLP


Bradley T. Weeks
Attorney for Quartz Hill Water District

Dated: December ____, 2015

CALIFORNIA WATER SERVICE
COMPANY

John Tootle
Attorney for California Water Service
Company

Dated: December 15, 2015

MURPHY & EVERTZ LLP


Douglas J. Evertz
Attorney for City of Lancaster and
Rosamond
Community Services District

1 Dated: December 15, 2015

LAGERLOF SENECAI GOSNEY &
KRUSE


Thomas Bunn III
Attorney for Palmdale Water District

6 Dated: December ____, 2015

LEMIEUX & O'NEILL

W. Keith Lemieux
Attorney for Littlerock Creek Irrigation
District and Palm Ranch Irrigation District

11 Dated: December 29, 2015

CHARLTON WEEKS LLP


Bradley T. Weeks
Attorney for Quartz Hill Water District

16 Dated: December ____, 2015

CALIFORNIA WATER SERVICE
COMPANY

John Tootle
Attorney for California Water Service
Company

22 Dated: December ____, 2015

MURPHY & EVERTZ LLP

Douglas J. Evertz
Attorney for City of Lancaster and
Rosamond
Community Services District

1 Dated: December ____, 2015

LAGERLOF SENECAI GOSNEY &
KRUSE

Thomas Bunn III
Attorney for Palmdale Water District

6 Dated: December ____, 2015

LEMIEUX & O'NEILL

W. Keith Lemieux
Attorney for Littlerock Creek Irrigation
District and Palm Ranch Irrigation District

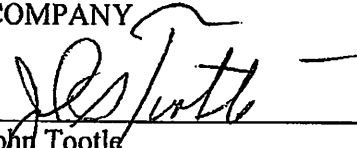
11 Dated: December ____, 2015

CHARLTON WEEKS LLP

Bradley T. Weeks
Attorney for Quartz Hill Water District

16 Dated: December 16, 2015

CALIFORNIA WATER SERVICE
COMPANY



John Tootle
Attorney for California Water Service
Company

22 Dated: December ____, 2015

MURPHY & EVERTZ LLP

Douglas J. Evertz
Attorney for City of Lancaster and
Rosamond
Community Services District

1 Dated: December ____, 2015

LAGERLOF SENECAI GOSNEY &
KRUSE

Thomas Bunn III
Attorney for Palmdale Water District

6 Dated: December ____, 2015

LEMIEUX & O'NEILL

W. Keith Lemieux
Attorney for Littlerock Creek Irrigation
District and Palm Ranch Irrigation District

11 Dated: December ____, 2015

CHARLTON WEEKS LLP


Bradley T. Weeks
Attorney for Quartz Hill Water District

16 Dated: December ____, 2015

CALIFORNIA WATER SERVICE
COMPANY

John Tootle
Attorney for California Water Service
Company

22 Dated: December 15, 2015

MURPHY & EVERTZ LLP


Douglas S. Evertz
Attorney for City of Lancaster and
Rosamond
Community Services District

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

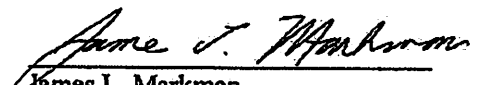
~~Dated: December _____, 2015~~

~~MURPHY & EVERTZ LLP~~

~~Douglas J. Evertz
Attorney for City of Lancaster and
Rosamond
Community Services District~~

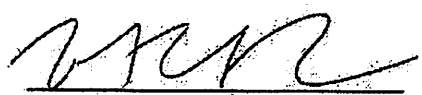
Dated: December 15, 2015

RICHARDS WATSON & GERSHON


James L. Markman
Patrick Skahan
Attorney for City of Palmdale

Dated: December 24, 2015

SMILAND CHESTER ALDEN LLP


Theodore A. Chester, Jr.
Attorneys for Little Rock Sand and Gravel,
Inc.; The George and Charlene Lane Family
Trust; The Frank and Yvonne Lane 1993
Family Trust; Monte Vista Building Sites,
Inc., and A.V. Materials, Inc.

1 ANTELOPE VALLEY GROUNDWATER CASES
2 Santa Clara Case No. 1-05-CV-049053

3 **PROPOSED ORDER**

4 **IT IS HEREBY ORDERED**, pursuant to the Stipulation by all parties, as follows:

5 1. The Request for Entry of Default and Default entered on March 23, 2012, as
6 against Frank A. Lane, Roe 612, is hereby set aside; and

7 2. Amended Exhibit 1 to [Proposed] Judgment and Physical Solution, filed by Los
8 Angeles County Waterworks District No. 40 on December 4, 2015, is deemed to be corrected by
9 deleting the following line item on page 8: "Roe 612 Frank A. Lane 3/23/2012 5/8/2013."

10
11 Dated: January ____, 2015

12
13 _____
14 JUDGE OF THE SUPERIOR COURT

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3 COUNTY OF LOS ANGELES)
4

5 I, Felicia Herbstreith am employed in the County of Los Angeles, State of California. I
6 am over the age of 18 and not a party to the within action; my business address is: 140 South
7 Lake Avenue, Suite 274, Pasadena, California 91101.

8 On **December 29, 2015**, I served the foregoing document described as: **STIPULATION**
9 **AND [PROPOSED] ORDER TO SET ASIDE DEFAULT OF CROSS-DEFENDANT**
10 **FRANK A. LANE; AND FOR ORDER CORRECTING AMENDED EXHIBIT 1 TO**
11 **[PROPOSED] JUDGMENT AND PHYSICAL SOLUTION** on the interested parties in this
12 action by posting the document listed above to the Santa Clara County Superior website in
13 regard to the Antelope Valley Groundwater Adjudication matter, pursuant to the Electronic
14 Filing and Service Standing Order of Judge Komar.
15

16 I declare under penalty of perjury under the laws of the State of California that the above
17 is true and correct.

18 Executed on **December 29, 2015**, at Pasadena, California.

19
20 /s/ Felicia Herbstreith
21 Felicia Herbstreith
22
23
24
25
26
27
28